DOCKET No FST-CV-17-6030788 : SUPERIOR COURT

BEVERLY WRIGHT : J.D. OF STAMFORD/NORWALK

VS. : AT STAMFORD

GLAZER GROUP, LLC AND GLAZER CONSTRUCTION AND DEVELOPMENT LLC

DEVELOPMENT, LLC : APRIL 7, 2017

#### ANSWER

#### COMPLAINT

- 1. As to paragraph 1, the Defendant does not have sufficient knowledge or information upon which to form a belief, and therefore leaves the Plaintiff to her proof.
  - 2. Paragraph 2 is admitted.
- 3. So much of paragraph 3 as alleges "The Defendant, GLAZER CONSTRUCTION AND DEVELOPMENT, LLC (hereinafter "GLAZER CONSTRUCTION"), is a limited liability corporation" is admitted, and the remaining portion of the paragraph is denied.
- 4.-11. Paragraphs 4, 5, 6, 7, 8, 9, 10 and 11 are admitted.
- 12. As to paragraph 12, the Defendant does not have sufficient knowledge or information upon which to form a belief, and therefore, leaves the Plaintiff to her proof.

13.-16. Paragraphs 13, 14, 15 and 16 are denied.

#### FIRST COUNT

- 1. 16. The answers to Paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into this Answer to the First Count, as paragraphs 1 through 16.
  - 17.-18. Paragraphs 17 and 18 are admitted.
  - 19. Paragraph 19 is denied.
  - 20.-21. Paragraphs 20 and 21 are admitted.
  - 22.-23. Paragraphs 22 and 23 are denied.

# SECOND COUNT

- 1.-16. The answers to Paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into this Answer to the Second Count, as paragraphs 1 through 16.
  - 17. Paragraph 17 is admitted.
  - 18.-20. Paragraphs 18, 19 and 20 are denied.

# THIRD COUNT

- 1.-16. The answers to Paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into this Answer to the Third Count, as paragraphs 1 through 16.
  - 17.-18. Paragraphs 17 and 18 are admitted.
  - 19.-20. Paragraphs 19 and 20 are denied.

# FOURTH COUNT

- 1.-4. The answers to paragraphs 1 through 4, inclusive, of the Complaint are hereby incorporated into this Answer to the Fourth County, as paragraphs 1 through 4.
  - 5. Paragraph 5 is admitted.
- 6.-7. As to paragraphs 6 and 7, the Defendant does not have sufficient knowledge or information to form a belief, and therefore leave the Plaintiff to her proof.
- 8.-12. Paragraphs 8, 9, 10, 11 and 12 are denied. FIFTH COUNT
- 1.-5. The answers to paragraphs 1 through 5, inclusive, of the Complaint are hereby incorporated into this Answer of the Fifth Count, as paragraphs 1 through 5.
  - 6. Paragraph 6 is admitted.
- 7.-13. Paragraphs 7, 8, 9, 10, 11, 12 and 13 are denied.

# SIXTH COUNT

1.-16. The answers to paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into

this Answer to the Sixth Count, as paragraphs 1 through 16.

- 17.-18. Paragraphs 17 and 18 are admitted.
- 19. Paragraph 19 is denied.
- 20. As to paragraph 20, the Defendant does not have sufficient knowledge or information upon which to form a belief, and therefore leaves the Plaintiff to her proof.
  - 21.-22. Paragraphs 21 and 22 are denied.

#### SEVENTH COUNT

- 1.-16. The answers to paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into this Answer to the Seventh Count, as paragraphs 1 through 16.
  - 17. Paragraph 17 is admitted.
  - 18.-19. Paragraphs 18 and 19 are denied.

# EIGHTH COUNT

- 1.-16. The answers to paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into this Answer to the Eighth Count, as paragraphs 1 through 16.
  - 17.-23. The answers to paragraphs 17 through 23 of

the First Count are hereby incorporated into this, the Eighth Count, as paragraphs 17 through 23.

- 24.-27. The answers to paragraphs 17 through 20 of the Third Count are hereby incorporated into this, the Eighth Count, as paragraphs 24 through 27.
- 28.-33. The answers to paragraphs 17 through 20 of the Sixth Count are hereby incorporated into this, the Eighth Count, as paragraphs 28 through 33.
  - 34.-37. Paragraphs 34, 35, 36, and 37 are denied.
- 38. As to paragraph 38, the Defendant does not have sufficient knowledge or information upon which to form a belief, and therefore leaves the Plaintiff to her proof.

# NINTH COUNT

- 1.-16. The answers to paragraphs 1 through 16, inclusive, of the Complaint are hereby incorporated into this Answer to the Ninth Count, as paragraphs 1 through 16.
- 17.-20. The answers to paragraphs 17 through 20 of the Second Count are hereby incorporated into this, the Ninth Count, as paragraphs 17 through 20.
  - 21.-23. The answers to paragraphs 17 through 19 of

the Seventh Count are hereby incorporated into this, the Ninth Count, as paragraphs 21 through 23.

- 24.-26. Paragraphs 24, 25, and 26 are denied.
- 27. As to paragraph 27, the Defendant does not have sufficient knowledge or information upon which to form a belief, and therefore leaves the Plaintiff to her proof.

THE DEFENDANTS

By\_

John J. Bove, Juris No. 101071 Their Attorney

96 East Avenue, Norwalk, CT 06851

203-853-1344

I certify that I have mailed a copy to Attorney Mark A. Sank and Attorney Sara M. Gould, 666 Glenbrook Road,

Stamford, CT 06906

John J. Bove, Their Attorney